

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION**

INTELLECTUAL VENTURES I, LLC and
INTELLECTUAL VENTURES II, LLC,

Plaintiffs,

v.

LENOVO GROUP LTD., LENOVO (UNITED
STATES) INC., LENOVOEMC PRODUCTS
USA, LLC, and EMC CORP.,

Defendants.

Case No. 1:16-cv-10860-PBS

JOINT PROPOSED '459 PATENT SCHEDULE

Pursuant to the Court's request, the parties jointly submit this proposed schedule for U.S. Patent No. 6,968,459.

Event	Date
Defendants to complete production of Technical Documents for the '459 patent (LR 16.6(d)(4)) ¹	January 7, 2019
Plaintiffs to complete production of Prosecution History documents, Ownership Evidence, and documents showing the Real Parties in Interest for the '459 patent (LR 16.6(d)(1)(B)-(D))	January 7, 2019
Exchange terms and proposed constructions for '459 patent (LR 16.6(e)(1)(A))	January 25, 2019
Confer re: proposed terms for the '459 patent (LR 16.6(e)(1)(B))	February 1, 2019
File Joint Claim Construction Chart for the '459 patent (LR 16.6(e)(1)(D))	February 8, 2019

¹Defendants will produce source code, if any, relevant to functionality properly identified in the infringement contentions pursuant to the procedures set forth in the Agreed Protective Order.

Simultaneous Opening Claim Construction Briefs on the '459 patent (LR 16.6(e)(2))	March 1, 2019
Tutorial filing (LR 16.6(e)(6))	March 1, 2019
Simultaneous Response Briefs on the '459 patent (LR 16.6(e)(4))	March 29, 2019
Claim Constructing Hearing on the '459 patent	April 12, 2019
Mediation	30 days after Claim Construction Ruling
Completion of Written Discovery relating to the '459 Patent (last to serve written discovery)	60 days after Claim Construction Ruling
Completion of Fact Discovery relating to the '459 patent	90 days after Claim Construction Ruling
Opening Expert Disclosures relating to the '459 patent (on issues on which the party bears the burden of proof)	120 days after Claim Construction Ruling
Rebuttal Expert Disclosures relating to the '459 patent	150 days after Claim Construction Ruling
Close of Expert Discovery relating to the '459 patent	180 days after Claim Construction Ruling
Dispositive Motions on the '459 patent or Daubert Motions (only one dispositive motion and one Daubert motion per party)	210 days after Claim Construction Ruling
Oppositions	240 days after Claim Construction Ruling
Replies	247 days after Claim Construction Ruling
Hearing on Dispositive Motions on the '459 patent or Daubert Motions	260 days after Claim Construction Ruling (to be set by Court)
Final Pretrial Disclosures (Fed. R. Civ. P. 26(a)(3))	60 days after Ruling on Dispositive Motions
Final Pretrial Conference	90 days after Ruling on Dispositive Motions
Trial	120 days after Ruling on Dispositive Motions

Dated: January 4, 2019

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CERTIFICATE OF SERVICE

I hereby certify that the counsel of record who are deemed to have consented to electronic service are being served on January 4, 2019, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by electronic mail, facsimile transmission and/or first class mail on this same date.

/s/ Brian D. Ledahl